

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,  
  
Plaintiff,

v.

GOOGLE LLC,  
  
Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. Donald L. Cabell

**JOINT STATEMENT REGARDING CLOUD TPU INSPECTION**

Plaintiff, Singular Computing LLC (“Singular”), and defendant, Google LLC (“Google”), respectfully submit this Joint Statement pursuant to the Court’s August 27, 2021 order (Dkt. 309) and the parties’ August 31, 2021 Joint Statement (Dkt. 313).

With regard to Singular’s motion to inspect the Cloud TPU (Dkt. 262), the parties have reached agreement: Google will provide Singular \$5,000 in Cloud TPU credit (which equates to 2083 preemptible TPU-hours on a TPU v3 under current pricing) to facilitate Singular’s testing, and Singular will bear the costs of any additional Cloud TPU access or testing time.

In light of this agreement, Singular’s Motion to compel inspection of the Cloud TPU (Dkt. 262) is now moot.

Dated: September 3, 2021

Respectfully submitted,

/s/ Kevin Gannon

Paul J. Hayes (BBO #227000)  
Matthew D. Vella (BBO #660171)  
Brian M. Seeve (BBO #670455)  
Kevin Gannon (BBO #640931)  
Daniel McGonagle (BBO #690084)  
**PRINCE LOBEL TYE LLP**  
One International Place, Suite 3700

*Attorneys for Plaintiff Singular Computing LLC*

Dated: September 3, 2021

*/s/ Matthias Kamber*

---

Gregory F. Corbett (BBO #646394)  
gregory.corbett@wolfgreenfield.com  
Nathan R. Speed (BBO # 670249)  
nathan.speed@wolfgreenfield.com  
Elizabeth A. DiMarco (BBO #681921)  
elizabeth.dimarco@wolfgreenfield.com  
WOLF, GREENFIELD & SACKS, P.C.  
600 Atlantic Avenue  
Boston, MA 02210  
Telephone: (617) 646-8000  
Fax: (617) 646-8646

Asim Bhansali (*pro hac vice*)  
abhansali@kblfirm.com  
KWUN BHANSALI LAZARUS LLP  
555 Montgomery Street, Suite 750  
San Francisco, CA 94111

Matthias Kamber (*pro hac vice*)  
mkamber@keker.com  
KEKER, VAN NEST & PETERS LLP  
633 Battery Street  
San Francisco, CA 94111-1809

*Attorneys for Defendant Google LLC*